

VIRGINIA: IN THE CIRCUIT COURT OF ROANOKE CITY

TAMMY LAVONNE HARMON

PLAINTIFF

VS.

SAM'S EAST, INC.
1455 Towne Square Blvd. NW
Roanoke, Virginia 24012

A DIVISION OF

WALMART, INC.
708 SW 8th Street
Bentonville, Arkansas 72716

DEFENDANTS

SERVE:

CT CORPORATION
4701 Cox Road, Ste 285
Glen Allen, Virginia 2306-6808

REGISTERED AGENT

Case Number: _____

COMPLAINT

Plaintiff, Tammy Lavonne Harmon, moves for judgment against Defendants, Sam's East, Inc., a division of Walmart, Inc., jointly and severally, on the grounds and in the amount set forth below:

1. Defendant, Sam's East is a corporation organized under the laws of the State of Virginia, and operates a place of business in Roanoke, Virginia.

2. As the owner and operator of Sam's East, Inc., a place of business to which the general public is invited, defendants and their agents and employees had a duty to maintain the storage and display of their products in a reasonably safe manner; to make reasonable inspections to determine whether any products were stored and displayed in an unsafe manner; and to return the storage and display of said products to a safe manner.

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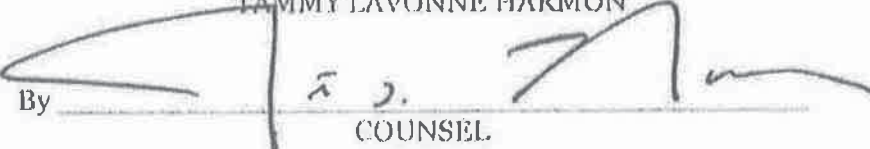
COMPLAINT

3. Notwithstanding said duty, defendants, their agents and employees negligently allowed fifty-pound tubs of laundry detergent to be stacked in such a way that they were unsafe for shoppers to remove them from the pallet on which they were stored and displayed.

4. On the 28th day of February, 2019, Plaintiff, Tammy Lavonne Harmon, was a customer in Sam's East, Inc. and was shopping for tubs of laundry detergent. When she placed a fifty-pound tub of detergent onto her shopping cart, two additional fifty-pound tubs fell on her right leg and ankle, causing severe injury.

5. As a direct and proximate result of the two fifty-pound tubs of laundry detergent falling on her right leg and ankle, Plaintiff has sustained serious and permanent injuries, has been prevented from transacting her business, has suffered and will continue to suffer great pain of body and mind; has sustained permanent disability, deformity and loss of income and earning capacity; has incurred and will incur in the future hospital, doctors' and related bills in an effort to be cured of said injuries.

WHEREFORE, Plaintiff demands judgment against the Defendants, Sam's East, Inc., a division of Walmart, Inc., in the sum of Three Hundred Fifty Thousand Dollars (\$350,000.00) and her costs expended in this action, all with interest as allowed by law.

TAMMY LAVONNE HARMON
By  J. L. McGrady
COUNSEL

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